- 1	
1	MELINDA HAAG (CABN 132612) United States Attorney
3	MIRANDA KANE (CABN 150630) Chief, Criminal Division
4 5	ACADIA L. SENESE (CABN 251287) KATHRYN R. HAUN (DCBN 484131) Assistant United States Attorneys
6 7 8	450 Golden Gate Avenue San Francisco, California 94102 Telephone: (415) 436-7200 Facsimile: (415) 436-7234 Email: acadia.senese@usdoj.gov, kathryn.haun@usdoj.gov
9	Attorneys for the United States
10	UNITED STATES DISTRICT COURT
11	NORTHERN DISTRICT OF CALIFORNIA
12	SAN FRANCISCO DIVISION
13	UNITED STATES OF AMERICA,) No. CR 08 0502 MMC
14	Plaintiff,)
15	v. STIPULATION AND [PROPOSED]
16	GALE JOSEPH YOUNG, PROTECTIVE ORDER
17	a/k/a Redbone
18	Defendant.
19	}
20	
21	Upon Stipulation of the parties for a protective order limiting the production, use, possession,
22	and dissemination of certain materials, for the reasons stated therein and in the materials
23	referenced therein:
24	ACCORDINGLY, IT IS HEREBY STIPULATED THAT:
25	1. Production and possession of the cooperator file ("Subject Materials") be limited only to
26	Robert Waggener and Jeffrey Wozniak, counsel for Gale Joseph Young, and Ken Heriot of
27	Heriot Investigations, and that possession of these materials is limited only to Robert Waggener,
28	Jeffrey Wozniak, those who are part of Robert Waggener's law office, and Ken Heriot;
	Stipulation and [Proposed] Proposed Order CR 08 0502 MMC

1	2. Robert Waggener's, Jeffrey Wozniak's, and Ken Heriot's possession and use of the
2	Subject Materials is only for the purpose of preparing for and trying the criminal case of Gale
3	Joseph Young, presently scheduled for October 17, 2011, and for no other purpose;
4	3. The Subject Materials shall not be distributed or disseminated to anyone else;
5	4. At the end of the trial of Gale Joseph Young on October 17, 2011, Robert Waggener,
6	Jeffery Wozniak, and Ken Heriot shall return all Subject Materials, and any and all copies of the
7	Subject Materials, to the Government, which will preserve the materials in case there is need for
8	them in any future litigation.
9	IT IS SO STIPULATED.
10	MELINDA HAAG
11	United States Attorney
12	
13	Dated: September 29, 2011 /s/ ACADIA I SENESE
14	KATHRYN HAUN Assistant United States Attorneys
15	Assistant Officer States Attorneys
16	Dated: September 29, 2011 /s/ ROBERT WAGGENER
17	Attorney for Gale Joseph Young
18	
19	IT IS HEREBY FOUND that there is good cause limiting the production, use, possession,
20	and dissemination of materials from the cooperator files ("Subject Materials"). Accordingly, the
21	stipulation is hereby APPROVED. IT IS SO ORDERED.
22	TI IS SO CINDERED.
23	man ma Dia
24	Dated: September 30, 2011 HOW MAXINE M. CHESNEY
25	United States District Judge
26	
27	
28	